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Attorneys for Defendants Amsberry, LeGore, Peters, and Vaafusuaga

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

JAMES WALTER WERBY,

Plaintiff,

v.

COLETTE PETERS, BRIGITTE
AMSBERRY, R. LEGORE, S.
VAAFUSUAGA, JOHN & JANE DOES,

Defendants.

Case No. 2:18-CV-01828-HZ

DEFENDANTS' MOTION TO COPY AND
INSPECT PLAINTIFF'S MEDICAL
RECORDS

CERTIFICATE OF CONFERRAL

Pursuant to L.R. 7-1(a)(1)(C), Defendants' counsel certifies that Plaintiff is a prisoner, not represented by counsel, in the custody of the Oregon Department of Corrections (ODOC), and is currently housed at the Eastern Oregon Correctional Institution (EOCI) located in Pendleton, Oregon.

MOTION

Defendants respectfully move this court for an order permitting Defendants to inspect and copy all of Plaintiff's relevant medical records kept by the Oregon Department of Corrections.

Defendants require access to inspect and copy Plaintiff's medical records during the pendency of

this case. Or. Rev. Stat. § 179.495 prohibits disclosure of Plaintiff's medical records to Defendants absent the requested court order. Defendants require the above-requested access to Plaintiff's medical records in order to properly prepare dispositive motions and defend this case.

DATED January 25, 2019.

Respectfully submitted,

ELLEN F. ROSENBLUM
Attorney General

s/ Michael R. Washington

MICHAEL R. WASHINGTON #873679
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Of Attorneys for Defendants

CERTIFICATE OF SERVICE

I certify that on January 25, 2019, I served the foregoing DEFENDANTS' MOTION TO COPY AND INSPECT PLAINTIFF'S MEDICAL RECORDS upon the parties hereto by the method indicated below, and addressed to the following:

JAMES WALKER WERBY

SID#14980408

Eastern Oregon Correctional Institution

2500 Westgate

Pendleton, OR 97801-9699

Pro Se Plaintiff

☐ HAND DELIVERY

☒ MAIL DELIVERY

☐ OVERNIGHT MAIL

☐ TELECOPY (FAX)

☐ E-MAIL

☐ E-SERVE

s/ Michael R. Washington

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